

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DEBBIE L. TREZVANT, TIMOTHY CAHILL,
DEBORAH CHERYL ARCH,
JOHN SWEENEY, JR., BRIE BASILIERE,
RUSSELL BROZ, JANE VINCENT,
LINDA BIRON, LAURENCE SOTT,
DEBRA MCDONALD-MUSTO,
LANCE MILNER, THOMAS WALTERS,
SYLVIE PARE-LALIBERTE, and
JENNIFER RAMBIN,

Plaintiffs,

v.

FIDELITY EMPLOYER SERVICES
CORPORATION, FIDELITY EMPLOYER
SERVICES COMPANY LLC, and FMR CORP.,

Defendants.

CIV. NO. 05-10673 WGY

JOINT MOTION TO STAY PROCEEDINGS

The parties hereby jointly move to stay all proceedings, including decisions by the Court on all pending motions, in the above-captioned matter through August 31, 2006. As grounds for this motion, the parties state that they have reached an agreement in principle to settle this case, and a stay of the proceedings will allow the parties to finalize the terms of a settlement agreement without incurring additional, unnecessary litigation expenses. The proposed stay will specifically include the Plaintiff's Motion to Certify Questions of State Law, filed on May 10, 2006, and Defendants' Motion for Default Against Plaintiffs Who Have Refused to Participate in Discovery, filed on July 11, 2006. The parties agree that if they are unable to finalize the settlement terms by August 31, 2006, proceedings in this matter will resume.

WHEREFORE, the parties respectfully move that this Court stay all proceedings, including decisions on all pending motions, until August 31, 2006, in order to allow the parties time to finalize a settlement agreement in this matter.

A proposed Order is attached as Exhibit A.

Respectfully submitted,

DEBBIE L. TREZVANT, TIMOTHY CAHILL,
DEBORAH CHERYL ARCH, JOHN SWEENEY,
JR., BRIE BASILIERE, RUSSELL BROZ, JANE
VINCENT, LINDA BIRON, LAURENCE SOTT,
DEBRA MCDONALD-MUSTO, LANCE
MILNER, THOMAS WALTERS, SYLVIE
PARE-LALIBERTE, and JENNIFER RAMBIN,
By their attorneys,

FIDELITY EMPLOYER SERVICES
CORPORATION, FIDELITY
EMPLOYER SERVICES COMPANY
LLC and
FMR CORP.,
By their attorneys,

/s/ Richard L. Alfred

/s/ Ira Spiro
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Dated: July 25, 2006

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DEBBIE L. TREVANT, TIMOTHY)	
CAHILL, DEBORAH CHERYL ARCH,)	
JOHN SWEENEY, JR., BRIE BASILIERE,)	
RUSSELL BROZ, JANE VINCENT,)	
LINDA BIRON, LAURENCE SOTT,)	
DEBRA MCDONALD-MUSTO,)	
LANCE MILNER, THOMAS WALTERS,)	
SYLVIE PARE-LALIBERTE, and)	
JENNIFER RAMBIN,)	
	Plaintiffs,) CIVIL ACTION NO. 05-10673 WGY
v.)	
)	
FIDELITY EMPLOYER SERVICES)	
CORPORATION, FIDELITY EMPLOYER)	
SERVICES COMPANY LLC, and FMR)	
CORP.,)	
	Defendants.)

PROPOSED ORDER ON THE PARTIES' JOINT MOTION TO STAY PROCEEDINGS

The parties' joint motion to stay all proceedings in this matter, including decisions by the Court on all pending motions, is hereby GRANTED for the reasons stated in the parties' motion. If the parties have not finalized the terms of settlement by August 31, 2006, proceedings will resume.

SO ORDERED.

WILLIAM G. YOUNG
United States District Judge
Dated: _____